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6 Attorneys for Defendants
KEN'S JAPANESE RESTAURANT and
7 JIM UENO, AS TRUSTEE OF THE UENO FAMILY TRUST

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 NELSON CHILIN

11 Plaintiff,

12 v.

13 KEN'S JAPANESE RESTAURANT;
14 JIM UENO, AS TRUSTEE OF THE
15 UENO FAMILY TRUST: and DOES 1
through 10;

16 Defendants.

CASE NO. 5:24-cv-00556-JGB-DTB

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANTS
KEN'S JAPANESE RESTAURANT
AND JIM UENO, AS TRUSTEE OF
THE UENO FAMILY TRUST TO
RESPOND TO PLAINTIFF
NELSON CHILIN'S COMPLAINT
(L.R. 8-3)**

Complaint served: April 1, 2024
Current response date: April 22, 2024
New response date: June 24, 2024

[[PROPOSED] ORDER LODGED
HEREWITH]

23
24 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:**

25 **WHEREAS**, the current deadline for defendants KEN'S JAPANESE
26 RESTAURANT and JIM UENO, AS TRUSTEE OF THE UENO FAMILY
27 TRUST (hereinafter collectively "defendants") to respond to plaintiff NELSON
28 CHILIN's (hereinafter "plaintiff") complaint is April 22, 2024.

1 **WHEREAS**, plaintiff and defendants are engaging in informal settlement
2 discussions.

3 **IT IS STIPULATED AND AGREED** by and between plaintiff and
4 defendants, through their respective counsel of record, that the above-entitled
5 Court enter an order extending the deadline for defendants to respond to plaintiff's
6 complaint to June 24, 2024.

7 **IT IS FURTHER STIPULATED AND AGREED** by and between
8 plaintiff and defendants, through their respective counsel of record, that this
9 stipulation may be executed in counterparts and that a copy, including a copy of an
10 electronic transmission, of an executed counterpart of this stipulation can be filed
11 with this Court and will be deemed to be an original.

12 **SO STIPULATED.**

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15 DATE: April 19, 2024

YEE & ASSOCIATES

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18 By: 

STEVEN R. YEE
Attorneys for Defendants KEN'S
JAPANESE RESTAURANT and
JIM UENO, AS TRUSTEE OF THE
UENO FAMILY TRUST

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23 DATE: April 19, 2024

SO. CAL. EQUAL ACCESS GROUP

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26 By: /s/ Jason J. Kim

JASON J. KIM
Attorneys for Plaintiff NELSON
CHILIN

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 3452 East Foothill Boulevard, Suite 1000, Pasadena, California 91107-6033.

On April 19, 2024, I served the foregoing document described as **STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS KEN'S JAPANESE RESTAURANT AND JIM UENO, AS TRUSTEE OF THE UENO FAMILY TRUST TO RESPOND TO PLAINTIFF NELSON CHILIN'S COMPLAINT (L.R. 8-3)** on all interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as stated on the **ATTACHED SERVICE LIST**.

() **BY MAIL** as follows:

() **STATE** - I am "readily familiar" with Yee & Associates' practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Pasadena, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

() **FEDERAL** - I deposited such envelope in the U.S. Mail at Pasadena, California with postage thereon fully prepaid.

(X) **BY EMAIL OR ELECTRONIC TRANSMISSION** as follows: Based on an agreement between the parties and/or pursuant to California Rules of Court Rule 2.251(c)(3) and/or pursuant to Judicial Council Emergency Rule 12 contained within Appendix I of Emergency Rules related to COVID-19 and all other applicable law, I caused the document(s) to be sent from the email address cjm@yeelaw.com to the persons at the email addresses listed in the service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

() **BY PERSONAL SERVICE** as follows: I caused a copy of such documents to be delivered by hand to the offices of the addressee between the hours of 9:00 a.m. and 5:00 p.m.

() **BY OVERNIGHT COURIER SERVICE** as follows: I caused such envelope to be delivered by overnight courier service to the offices of the addressee. The envelope was deposited in or with a facility regularly maintained by the overnight courier service with delivery fees paid or provided for.

() **BY FACSIMILE** as follows: I caused such documents to be transmitted to the telephone number of the addressee listed above, by use of facsimile machine telephone number (626) 449-8009. The facsimile machine used complied with California Rules of Court, Rule 2004 and no error was reported by the machine. Pursuant to California Rules of Court, Rule 2006(d), a transmission record of the transmission was printed.

() **FOR REPLY OR OPPOSITION PAPERS:** The foregoing Reply or Opposition papers were also transmitted to the telephone number of the addressee listed above, by use of facsimile machine telephone number (626) 449-8009, consistent with the provisions of Cal. Civ. Proc. Code Sections 1010, 1011, 1012, and 1013, and said transmission was reasonably calculated to ensure delivery to all other interested parties to the within action not later than the close of the next business day after the date the foregoing Reply or Opposition papers were filed, pursuant to Cal. Civ. Proc. Code Section 1005(b). The facsimile machine used complied with California Rules of Court, Rule 2004, no error was reported by the machine, and a transmission record of the transmission was printed.

(X) **STATE** - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

() **FEDERAL** - I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on April 19, 2024, at Pasadena, California.

Casey Muller-Bonnell
Casey Muller-Bonnell

SERVICE LIST

Nelson Chilin v. Ken's Japanese Restaurant, et al.
U.S. District Court Case No.: 5:24-cv-00556-JGB-DTB
File No.: 1462-001

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